

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SONYA LARSON,

Plaintiff,

v.

C. A. No.: 1:19-CV-10203-IT

DAWN DORLAND PERRY,
COHEN BUSINESS LAW GROUP, PC and
JEFFREY A. COHEN, ESQUIRE,

Defendants.

**JOINT MOTION TO ENLARGE TIME TO FILE JOINT SCHEDULING ORDER AND
RESPONSIVE PLEADINGS AND EXCHANGE INITIAL DISCLOSURES**

Defendants Dawn Dorland Perry (“Ms. Dorland”), Cohen Law Group (“Cohen Law”), and Jeffrey A. Cohen, Esq. (“Attorney Cohen”) (collectively “Defendants”) and Plaintiff Sonya Larson (“Ms. Larson” or “Plaintiff”) respectfully ask this Court to grant an enlargement of time of two weeks until April 24, 2020 to allow: 1) the parties to file a joint proposed scheduling order for further proceedings in this case; 2) the parties to exchange initial disclosures; and 3) the Defendants to each file responsive pleadings. As reasons therefore, the parties state:

1. On March 27, 2020, this Court issued a decision denying Defendants Cohen Law and Attorney Cohen’s motion to dismiss and partially denying and partially granting Ms. Dorland’s motion to dismiss.

2. Pursuant to Fed. R. Civ. P. 12(a)(4)(A), Defendants must serve their respective responsive pleadings within 14 days of the March 27, 2020 decision on April 10, 2020.

3. Also on March 27, 2020, the Court ordered that the parties serve their initial disclosures required by Fed. R. Civ. P. 26(a)(1) and to file a joint scheduling order for further proceedings in this case by April 10, 2020.

4. The parties have conferred and jointly ask the court to allow an enlargement of time of two weeks until April 24, 2020 to file their proposed joint scheduling order and to exchange initial disclosures. Additionally, all parties assent to a two week enlargement of time until April 24, 2020 for Defendants to file their respective responsive pleadings.

5. The parties make this request for a brief extension of time due to the logistical challenges arising out of the current COVID-19 health crisis. The requested enlargement will permit the parties to provide an orderly and coordinated response to the Court's orders.

WHEREFORE the parties request that the Court grant an enlargement of time until April 24, 2020 for the parties to file the proposed joint scheduling order, to exchange initial disclosures, and for the Defendants to file responsive pleadings.

Respectfully submitted,

DAWN DORLAND PERRY,
By her attorneys,

/s/ Elizabeth E. Olien
Howard M. Cooper, Esq. (BBO # 543842)
hcooper@toddweld.com
Elizabeth E. Olien, Esq. (BBO # 689350)
eolien@toddweld.com
TODD & WELD LLP
One Federal Street, 27th Floor
Boston, MA 02110
617-720-2626

COHEN BUSINESS LAW GROUP, PC and
JEFFREY A. COHEN, ESQUIRE,
By their attorneys,

/s/ Matthew H. Greene

Mark W. Shaughnessy, Esq. (BBO# 567839)
mshaughnessy@boyleshaughnessy.com
Matthew H. Greene, Esq. (BBO# 673947)
mgreene@boyleshaughnessy.com
Boyle | Shaughnessy Law, P.C.
695 Atlantic Avenue, 11th Floor
Boston, MA 02111
617-451-2000

SONYA LARSON,
By her attorneys,

/s/ Andrew D. Epstein

Andrew D. Epstein, Esq.
Photolaw@aol.com
Barker, Epstein & Loscocco
176 Federal St.
Boston, MA 02110
617-482-4900

Date: April 7, 2020

CERTIFICATE OF SERVICE

I, Elizabeth E. Olien, hereby certify that on April 7, 2020 the foregoing document was served electronically on all counsel of record via the Court's ECF filing system.

/s/ Elizabeth E. Olien
Elizabeth E. Olien